

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CRAFTWORK, INC., et al.,

Plaintiff,

v.

THEODORE ROBINSON, et al.,

Defendant.

Case No. 10 CV 3629

Honorable Robert M. Dow, Jr.  
Magistrate Young B. Kim

**PLAINTIFFS' MOTION FOR THE ENTRY OF A FINAL CONSENT JUDGMENT**

Plaintiffs, Craftwork, Inc. and Joseph R. Minnix (collectively referred to as "Craftwork"), by their undersigned counsel, move this Court for the entry of a Final Consent Judgment against Defendant, Jeffrey W. Deer ("Deer"), pursuant to a Confidential Settlement Agreement and Mutual Release entered into by the parties. In support of this Motion, Craftwork states as follows:

1. On or about March 28, 2012, Craftwork and Deer entered into a Confidential Settlement Agreement and Mutual Release (the "Agreement"), a copy of which is attached hereto as Exhibit 1.
2. The Agreement, at paragraph 2, requires Deer to make (16) quarterly payments in the amount of \$8,593.75, beginning on July 2, 2012. Although twelve (12) payments have been made, each and every payment has been late.
3. Under the Agreement, a payment was due on July 1, 2015 from Deer, but that payment was not made. Pursuant to Paragraph 2 of the Agreement, Deer had fourteen (14) days to cure his failure to make the July 1, 2015 payment. As of the date of filing this Motion, Deer has not made the July 1, 2015 payment under the Agreement.

4. Paragraph 3 of the Agreement provides that if Deer fails to make a quarterly payment, then Craftwork is entitled to the entry of a "Final Consent Judgment for an amount of two (2) times the total amount of the remaining unpaid quarterly payments as set forth in Paragraph 2 [of the Agreement]." (Agreement ¶3).

5. There are four (4) quarterly payments still due and owing from Deer, for the period July 1, 2015 through April 1, 2016. The amount of those quarterly payments are \$8,593.75 per quarter. Since the Agreement provides that Craftwork is entitled to a Consent Judgment in the amount of twice the remaining amount due, Craftwork is entitled to a Final Consent Judgment in the amount of \$68,600.00 as set forth in Exhibit A to the Agreement.

6. The Agreement contained a Final Consent Judgment, attached as Exhibit A, which reflects the Final Consent Judgment that will be entered in favor of Craftwork, in the sum of \$68,600.00.

7. Attached hereto as Exhibit 1 is a copy of the Final Consent Judgment that both Craftwork and Deer executed in March 2012, when the Agreement was signed. Pursuant to the Agreement, Craftwork requests the Court to enter the Final Consent Judgment in the amount of \$68,600.00 against Deer.

8. As required by the Agreement, this Motion is supported by a Certification from Craftwork, subject to the penalties of perjury as provided for in 28 U.S.C. Section 1746, that Deer has failed to comply with all of the terms set forth in Paragraph 2 of the Agreement.

WHEREFORE, Plaintiffs Craftwork, Inc. and Joseph R. Minnix respectfully request this Court to enter the Final Consent Judgment in the amount of \$68,600.00.

CRAFTWORK, INC. AND JOSEPH R.  
MINNIX

By: s/Steven J. Rotunno

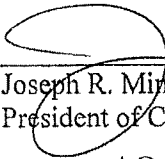
One of their Attorneys

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Dated: October 8 2015

**CERTIFICATION**

I, Joseph R. Minnix, individually and as President of Craftwork, Inc., subject to the penalties of perjury as provided for in 28 U.S.C. Section 1746, hereby certify that the Defendant Jeffrey W. Deer failed to comply with all of the terms set forth in paragraph 2 of that Confidential Settlement Agreement and Mutual Release ("Agreement") executed by Craftwork, Inc., Joseph R. Minnix, Jeffrey W. Deer and Deer, Stone & Morgan, P.C., specifically failing to make the July 1, 2015 payment under the Agreement

  
\_\_\_\_\_  
Joseph R. Minnix, individually and as  
President of Craftwork, Inc.

Dated: \_\_\_\_\_

10-6-15

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2015, I electronically filed the foregoing, **PLAINTIFFS' MOTION FOR THE ENTRY OF A FINAL CONSENT JUDGMENT**, with the Clerk of Court using the CM/ECF system, which will cause this Motion to be sent to all parties to this lawsuit via the Court's electronic system.

I also certify that I caused this Motion to be served on Theodore Robinson, 3342 W. Ogden, Chicago, IL 60623 by U.S. Mail by placing same in an envelope addressed to him with proper postage prepaid and depositing the same in the U.S. Postal Service Collection box at 225 W. Washington Street, Chicago IL 60606 on October 8, 2015 before 5:00 p.m.

s/Steven J. Rotunno